

In the Matter Of:

IN RE LTL Management LLC

ADAM PULASKI

April 15, 2023



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<p>1 UNITED STATES BANKRUPTCY COURT 2 DISTRICT OF NEW JERSEY 3 4 In Re: Chapter 11 5 LTL MANAGEMENT, LLC, Case No. 23-12825 (MBK) 6 Debtor. 7 _____/ 8 ORAL VIDEO TAPE DEPOSITION 9 ADAM PULASKI 10 APRIL 15, 2023 11 "CONFIDENTIAL" 12 - - - 13 14 Oral sworn videotaped deposition of 15 ADAM PULASKI, taken remotely, before Patricia R. 16 Frank, Registered Merit Reporter, Certified 17 Realtime Reporter, and Notary Public, commencing 18 at 9:40 a.m. EDT, on the above date. 19 20 21 22 23 24 25 Lexitas Job No. 892935</p>	<p>1 (Appearances cont'd.) 2 ATTORNEYS FOR THE DEBTOR: 3 JONES DAY 4 BY: JAMES M. JONES, ESQUIRE 5 250 Vesey Street New York, NY 10281 212.326.7838 jmjones@jonesday.com 6 7 ATTORNEYS FOR JOHNSON & JOHNSON: 8 WHITE & CASE LLP 9 BY: MATTHEW E. LINDE, ESQUIRE 111 South Wacker Drive Suite 5100 10 Chicago IL 60606-4302 312.881.5421 mlinder@whitecase.com 11 12 ATTORNEYS FOR ARNOLD & ITKIN: 13 PACHULSKI, STANG, ZIEHL & JONES LLP 14 BY: PETER J. KEANE, ESQUIRE LAURA DAVIS JONES, ESQUIRE 919 North Market Street, 17th Floor Wilmington, DE 19801 16 302.652.4100 pkeane@pszjlaw.com ljones@pszjlaw.com 17 18 ATTORNEYS FOR THE TCC: 19 GOLOMB SPIRT GRUNFELD PC 20 BY: RICHARD GOLOMB, ESQUIRE 1835 Market Street, Suite 2900 21 Philadelphia, PA 19103 22 215.985.9177 rgolomb@golomblegal.com 23 24 25 (Appearances cont'd. on next page)</p>
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<p>1 A P P E A R A N C E S: 2 (All parties appearing remotely) 3 PROPOSED COUNSEL FOR THE OFFICIAL COMMITTEE OF TALC CLAIMANTS: 5 OTTERBOURG P.C. BY: RICHARD G. HADDAD, ESQUIRE 6 MELANIE L. CYGANOWSKI, ESQUIRE DAVID A. CASTLEMAN, ESQUIRE 7 230 Park Avenue New York, NY 10169-0075 8 212.661.9100 rhaddad@otterbourg.com mcyganowski@otterbourg.com dcastleman@otterbourg.com 10 BROWN RUDNICK LLP BY: MICHAEL S. WINOGRAD, ESQUIRE GERARD T. CICERO, ESQUIRE 12 7 Times Square New York, NY 10036 13 212.209.4800 mwinograd@brownrudnick.com gcicero@brownrudnick.com 14 ATTORNEYS FOR THE WITNESS: 16 DALY & BLACK, P.C. BY: JOHN BLACK, ESQUIRE 17 2211 Norfolk Street, Suite 800 Houston, TX 77098 713.655.1405 jblack@dalyblack.com 18 ATTORNEYS FOR THE DEBTOR: 21 JONES DAY BY: DAVID S. TORBORG, ESQUIRE 22 51 Louisiana Avenue, N.W. Washington, D.C. 20001-2113 202.879.3939 dtorborg@jonesday.com 24 25 (Appearances cont'd. on next page)</p>	<p>1 (Appearances cont'd.) 2 ATTORNEYS FOR TCC 1: 3 MOTLEY RICE LLC 4 BY: DANIEL LAPINSKI, ESQUIRE 210 Lake Drive East Suite 101 Cherry Hill, NJ 08002 5 856.382.4670 dlapinski@motleyrice.com 6 MOTLEY RICE LLC 8 JAMES A. BADEN, IV, ESQUIRE 23 Bridgesside Boulevard Mount Pleasant, SC 29464 9 843.216.9000 jbaden@motleyrice.com 10 ATTORNEYS FOR VARIOUS TALC CLAIMANTS: 12 LEVY KONIGSBERG LLP 13 BY: JEROME H. BLOCK, ESQUIRE 605 Third Avenue, 33rd Floor 14 New York, NY 10158 800.315.3806 jblock@levylaw.com 15 LAW OFFICES OF MITCHELL J. MALZBERG, LLC BY: MITCHELL J. MALZBERG, ESQUIRE 16 6 E. Main Street, Suite 7 Clinton, NJ 08809 17 908.323.2958 mmalzberg@mjmazberglaw.com 18 WATTS GUERRA LLC BY: MIKAL WATTS, ESQUIRE 20 15 Calle 2, Suite 410 Guaynabo, PR 00966 mcwatts@wattsguerra.com 21 22 23 24 25 (Appearances cont'd. on next page)</p>

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1 Privileged.	1 8-K filed with the Securities and Exchange
2 BY MR. HADDAD:	2 Commission on April 4, 2023?
3 Q. Do any?	3 A. I briefly looked at that.
4 MR. BLACK: Objection.	4 Q. Did you read the sentence that
5 Privileged.	5 said, quote, LTL also has secured commitments
6 BY MR. HADDAD:	6 from over 60,000 current claimants to support
7 Q. Is the Plan Support Agreement	7 a global resolution on these terms, unquote?
8 binding or illusory?	8 A. Yes.
9 MR. BLACK: Objection.	9 Q. Do your 6,000 current claimants
10 Privileged.	10 support the global resolution on these terms?
11 BY MR. HADDAD:	11 MR. BLACK: Objection.
12 Q. Do you consider the Plan	12 Privileged.
13 Support Agreement to be binding?	13 BY MR. HADDAD:
14 MR. BLACK: Objection.	14 Q. Does LTL have secured
15 Privileged.	15 commitments from over 60,000 current
16 BY MR. HADDAD:	16 claimants to support a global resolution?
17 Q. When you signed your name to	17 A. My understanding is they have
18 the Plan Support Agreement, sir, what were	18 commitments from attorneys representing those
19 you intending to convey?	19 clients, if not more, and I believe there are
20 A. I was intending --	20 probably more with attorneys that are going
21 MR. BLACK: I think that's	21 to recommend that their clients support the
22 privileged, too. I mean he signed it, so	22 agreement.
23 what he intended as a lawyer is privileged	23 Q. You would agree with me that
24 so --	24 there's a difference between a recommendation
25 BY MR. HADDAD:	25 to support and a commitment to support by the
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1 Q. Are you aware that the debtor's	1 claimant itself, correct, sir?
2 chief legal officer, Mr. Kim, testified	2 A. Semantics, but, yes.
3 yesterday that anyone who wishes to withdraw	3 Q. Semantics? I misheard -- I'm
4 from the Plan Support Agreement may do so?	4 not sure I heard you.
5 A. I was not on Mr. Kim's	5 A. There is a difference.
6 deposition, nor do I really know what he	6 MR. HADDAD: All right. Thank
7 said.	7 you. That's all I've got for now.
8 MR. TORBORG: This is	8 BY MR. SATTERLEY:
9 Mr. Torborg for the debtors. I'm going to	9 Q. Good morning, sir. This is Joe
10 object to that last question as	10 Satterley. Do you need to take a break
11 mischaracterizing Mr. Kim's testimony. Thank	11 before we begin? I think I'm going to be the
12 you.	12 second attorney to go.
13 MR. HADDAD: The transcript	13 A. No. I'm good, Mr. Satterley.
14 says what it says.	14 I appreciate it.
15 MR. TORBORG: It does.	15 Q. Okay. Can you hear me okay?
16 BY MR. HADDAD:	16 A. I can.
17 Q. Sir, is there -- do you have	17 Q. Okay. I represent Mr. Valadez
18 any agreement with anyone to pay you legal	18 and many other mesothelioma victims.
19 fees in connection with the bankruptcy case?	19 Have you had a chance to log in
20 A. No.	20 and watch any of the hearings with Judge
21 Q. Sir, did you see the debtor's	21 Kaplan?
22 8-K filed on April 4, 2023?	22 A. I was on the hearing on
23 A. Can you repeat the question,	23 Wednesday -- Tuesday, Tuesday.
24 please?	24 Q. The long hearing, ten o'clock
25 Q. Have you seen the debtor's Form	25 in the morning till about 4:30, were you on
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